

# EDWARD STONE LAW

September 6, 2016

**VIA ECF**

Hon. Cathy Seibel  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

**RE: Lafontant v. Washington Square Financial, LLC et al. (14 Civ. 9895)**

Dear Judge Seibel:

We represent Plaintiff Michael Lafontant in the above referenced matter and confirm that we are in receipt of the August 19, 2016 letter from the American Arbitration Association closing the Lafontant arbitration matter.

As no answer or motion for summary judgment was filed by Defendants in this matter, we believe it is appropriate to dismiss this matter under F.R.C.P. Rule 41 (a) (1) (A) (i) without prejudice, and have attached our Notice of Voluntary Dismissal to this letter.

We believe a dismissal without prejudice is appropriate as neither this Court nor the American Arbitration Association has ruled on the merits of Mr. Lafontant's claims.

Sincerely,



Edward S. Stone

cc: [chambersnysdseibel@nysd.uscourts.gov](mailto:chambersnysdseibel@nysd.uscourts.gov)

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**UNITED STATES DISTRICT COURT FOR  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL LAFONTANT,

Plaintiff,

v.

WASHINGTON SQUARE FINANCIAL,  
LLC d/b/a IMPERIAL STRUCTURED  
SETTLEMENTS, IMPERIAL FINANCE &  
TRADING, LLC;  
IMPERIAL HOLDINGS INC.; and  
ANDREW LEVINE

Defendants.

Case No. 14-CIV-9895

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**  
**PURSUANT TO F.R.C.P 41(a)(1) (A) (i)**

Pursuant to Rule 41(a) (1) (A) (i) of the Federal Rules of Civil Procedure, Plaintiff Michael Lafontant, by his undersigned counsel, hereby dismisses his claims in the First Amended Complaint without prejudice.

Dated September 6, 2016

Respectfully submitted,

/s/ Edward S. Stone

Edward S. Stone

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 6, 2016, I caused the foregoing Rule 41(a) Notice of Dismissal without Prejudice to be filed with the United States District Court for the Southern District of New York via the Court's CM/ECF system, which will provide electronic notice to all counsel of record.

/s/ Edward S. Stone  
Edward S. Stone